

* * * * *

Materials Subject to Mandatory Disclosure

1. Any and all material or information, in any form, whether admissible or not, that tends to exculpate the defendant or negate or mitigate the guilt or punishment as to the offense(s) charged;
2. Any and all material or information, in any form, whether admissible or not, that tends to impeach a State's witness;

Materials Subject to Disclosure Upon Request

3. All written and oral statements of the defendant and of any co-defendant that relate to the offense(s) charged and all material and information, including documents and recordings, that relate to the acquisition of such statements;
4. As to any State's witness whom the State's Attorney intends to call to prove the State's case in chief, or to rebut alibi testimony, the written statements of the witness that relate to the offense(s) charged and are, a) signed or adopted by the witness or b) contained in a police or investigative report, together with the name and address of the witness;
5. Any relevant information regarding specific searches and seizures, eavesdropping, or electronic surveillance, including wiretaps;
6. Any pretrial identification of the defendant by a State's witness;
7. As to any witnesses the State intends to call to testify as experts: a) the expert's name and address, the subject matter on which the expert is expected to testify, the substance of the expert's findings and opinions and a summary of the grounds for each opinion, b) the opportunity to inspect and copy all written reports or statements made in connections with the action by the expert, including the results of any physical or mental examinations, scientific test, experiment or comparison; and c) the substance of any oral report and conclusion of the expert.

Materials Subject to Inspection by Defendant

8. The opportunity to inspect, copy and photograph all documents, computer-generated evidence as defined in Maryland Rule 2-504.3(a), recordings, photographs or other tangible things that the State's Attorney intends to use at a hearing or trial;
9. The opportunity to inspect, copy and photograph all items obtained from or belonging to the defendant, whether or not the State's Attorney intends to use them at trial.

PLEASE FORWARD DISCOVERY TO info@maronicklaw.com

Respectfully submitted,

/s/ Leonard Gutkoska

Leonard Gutkoska, Esq. (8501010251)
Maronick Law, LLC
7418 Baltimore Annapolis Blvd.
Glen Burnie, MD 21061
(410) 244-5068 – telephone
(410) 697-1512 - facsimile
info@maronicklaw.com

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that the foregoing was, on August 10, 2023, E-Filed and served on the State's Attorney for Frederick County.

CERTIFICATE OF UNRESTRICTED INFORMATION

I, the undersigned, hereby certify that the foregoing document does not contain any restricted information.

/s/ Leonard Gutkoska

Leonard Gutkoska, Esq. (8501010251)